

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

NAVIGATORS MANAGEMENT
COMPANY, INC., in its individual capacity
and on behalf of Navigators Insurance
Company, Inc,

Plaintiff,

v.

EURO CARGO EXPRESS INC. d/b/a ECX
Global Logistics,

Defendant

and

EURO CARGO EXPRESS INC. d/b/a ECX
Global Logistics,

Third-Party Plaintiff,

v.

SHINE INTERNATIONAL
TRANSPORTATION (HONG KONG) LTD.,
SHINE INTERNATIONAL
TRANSPORTATION (SHENZHEN) LTD.
and OCEAN NETWORK EXPRESS PTE.
LTD.,

Third-Party Defendants.

SHINE INTERNATIONAL
TRANSPORTATION (HONG KONG) LTD.,
SHINE INTERNATIONAL
TRANSPORTATION (SHENZHEN) LTD.,

Cross-Complainant,

v.

OCEAN NETWORK EXPRESS PTE. LTD.,
Cross-Defendant.

1:23-cv-05769

Hon. Jessica G. L. Clarke

MOTION FOR ADMISSION *PRO HAC VICE*

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, I, J. Stephen Simms, hereby move this Court for an Order for admission to practice *Pro Hac Vice* to appear as counsel for SHINE INTERNATIONAL TRANSPORTATION (HONG KONG) LTD. (“Shine HK”) and SHINE INTERNATIONAL TRANSPORTATION (SHENZHEN) LTD. (“Shine Shenzhen”) (collectively “Third-Party Defendants”).

I am in good standing of the bar of the state of Maryland and there are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached the affidavit pursuant to Local Rule 1.3. My current good standing certificate is filed herewith.

Dated: December 21, 2023.

/s/ J. Stephen Simms

J. Stephen Simms

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Counsel for Third-Party Defendants/Cross-
Claimants Shine International Transportation (Hong
Kong) Ltd. and Shine International Transportation
(Shenzhen) Ltd.

CERTIFICATE OF SERVICE

I certify that on December 21, 2023 I caused the foregoing to be filed on this Court's CM/ECF system for service on all record counsel.

/s/ J. Stephen Simms